

### **III. REMARKS**

Claims 1-2, 4-11, 14, 16-23, and 25-31 are pending in this application. Claim 1 has been amended, and no claims have been cancelled. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 2, and 4-10 are rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants respectfully traverse the rejection of claims 1, 2, and 4-10 under 35 U.S.C. § 101, and submit that the invention does recite statutory subject matter. However, Applicants herein amend claim 1 to recite a system “comprising a computer system including a central processing unit, an input/output interface, external devices, and a memory, wherein the memory includes ...” to provide additional clarity. This amendment finds its support in the specification at page 7, line 10-11. As noted in the Office Action at page 3-4, “when functional descriptive material is recorded on some computer-readable medium it becomes structurally and functionally interrelated to the medium and will be statutory in most cases since use of technology permits the function of the descriptive material to be realized.” As claimed herein, the system for exchanging automotive information between at least two automotive trading partners is stored a memory (see claim 1 as amended herein, lines 1-4), which inherently requires it to have been “recorded on some computer-readable medium.” The system is thereby “structurally and functionally interrelated to the medium,” “permit[ting] the function of the descriptive material to be realized” (Office Action at p. 3-4).

With respect to claims 2 and 4-10, Applicants respectfully submit that claims 2 and 4-10

are allowable for reasons stated above relative to independent claim 1, and for their own additional claimed subject matter. Accordingly, Applicants respectfully request that the Office withdraw the rejections under 35 U.S.C. § 101 to claims 2 and 4-10.

In the Office Action, claims 1-2, 4-11, 14, 16-23, and 25-31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Rivera (US 20020107699) in view of Walker (US 5,794,207). With respect to claim 1, Applicants respectfully submit that Rivera is not available as a reference against the invention claimed herein. Rivera was filed on 16 March 2001, and claims priority to Provisional Application 60/267,447, which was filed on 8 February 2001. The instant application was filed on 30 January 2001, which predates the earliest claimed priority date of Rivera by ten days. Applicants additionally submit that Walker does not teach each and every element of the claimed invention, including a translation system, a routing system, and a transaction management system, as in claim 1. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

With respect to the rejections of independent claims 11, 18, and 26, Applicants note that each of these claims includes features similar in scope to those already addressed above with respect to claim 1. Further, the Office relies on the same arguments and interpretations of Rivera and Walker as discussed above with respect to claim 1. To this extent, Applicants herein incorporate the arguments presented above with respect to claim 1, and respectfully request withdrawal of the rejections of claims 11, 18, and 26 for the above-stated reasons.

With respect to claims 2, 4-10, 14, 16-17, 19-23, 25, and 27-31, Applicants respectfully submit that these claims are allowable for reasons stated above relative to independent claims 1, 11, 18, and 26, as well as for their own additional claimed subject matter. Accordingly, Applicants respectfully request that the Office withdraw the rejections under 35 U.S.C. § 103(a)

to claims 2, 4-10, 14, 16-17, 19-23, 25, and 27-31.

#### **IV. CONCLUSION**

Applicants respectfully submit that the Application as presented is in condition for allowance. Should the Examiner believe that anything further is necessary in order to place the application in better condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

/ Ronald A. D'Alessandro /

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